

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
:
-v- : 09 Cr. 722 (MGC)
:
PAUL GREENWOOD and :
STEPHEN WALSH, :
:
Defendants. :
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U.S. DISTRICT COURT
FILED
S.D. OF N.Y.
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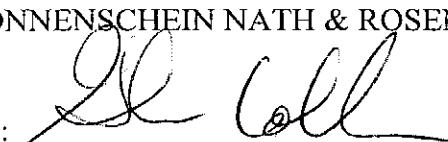
NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Glenn C. Colton,
dated October 27, 2009, the accompanying Declaration of Mark A. Flessner and the exhibit thereto,
the undersigned moves this Court for an Order, pursuant to Rule 1.3(c) of the Local Civil Rules of
the United States District Court for the Southern District of New York admitting Mark A. Flessner to
the bar of this Court *pro hac vice* to appear and participate as counsel for Defendant STEPHEN
WALSH in the above-captioned action.

Dated: New York, New York
October 27, 2009

SONNENSCHEIN NATH & ROSENTHAL LLP

By:


Glenn C. Colton (GC-2493)
1221 Avenue of the Americas
New York, New York 10020-1089
Telephone: 212-398-5797
gcolton@sonnenschein.com

OCT 28 2009

AM 828-704658

To:

John Jay O'Donnell, Jr.
U.S. Attorney's Office, SDNY
One St. Andrew's Plaza
New York, NY 10007
Tel: (212) 637-2490
John.O'Donnell@usdoj.gov

Frederick Phillip Hafetz
Susan Rose Necheles
Tracy Ellen Sivitz
Hafetz & Necheles
500 Fifth Avenue, 29th floor
New York, NY 10110
Tel: (212) 997-7595
fph@hafetzlaw.com
srn@hafetzlaw.com
tes@hafetzlaw.com

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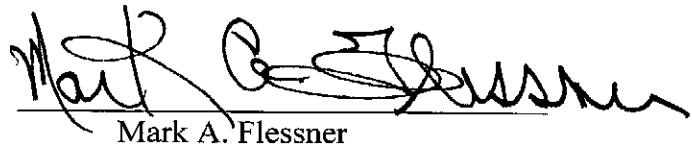
DECLARATION OF MARK A. FLESSNER

MARK A. FLESSNER declares as follows:

1. I am a Partner with the law firm Sonnenschein Nath & Rosenthal LLP, located at 233 S. Wacker Drive, Suite 7800, Chicago, Illinois 60606. I submit this declaration in support of the motion for my *pro hac vice* admission in this matter.
2. I am a member in good standing of the Supreme Court of Illinois. Attached as an exhibit hereto is a Certificate of Good Standing issued by the Supreme Court of Illinois.
3. I have never been suspended, disbarred or otherwise disciplined by any court and there are no pending disciplinary proceedings against me in any State or Federal Court.
4. I am familiar with the Local Rules for the Southern District of New York and agree to follow them in all matters relating to this action. I further agree to submit to the jurisdiction of this Court for the purposes of sanctions, discipline, or such other action as the Court may deem proper.
5. Wherefore, I respectfully request that I be permitted to appear and participate as counsel *pro hac vice* in the above-captioned case.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: October 26, 2009
Chicago, Illinois



A handwritten signature in black ink, appearing to read "Mark A. Flessner". The signature is fluid and cursive, with "Mark" on top, "A." in the middle, and "Flessner" on the bottom.

Mark A. Flessner

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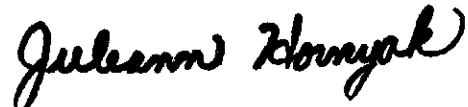
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Mark Alan Flessner

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on March 13, 1987 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto placed my hand and affixed the seal of said Supreme Court, at Springfield, in said State, this Thursday, October 15, 2009.



Clerk

**UNITED STATES DISTRICT COURT
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**DECLARATION OF GLENN C. COLTON
IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

I, GLENN C. COLTON, do hereby declare under the penalty of perjury pursuant to 28 U.S.C. §1746 as follows:

1. I am a Partner with the law firm Sonnenschein Nath & Rosenthal LLP, located at 1221 Avenue of the Americas, New York, New York, 10020, attorneys for Defendant STEPHEN WALSH in the above-captioned action. I submit this Declaration in support of the motion, pursuant to Local Civil Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, for an Order granting Mark A. Flessner admission pro hac vice to the bar of the United State District Court for the Southern District of New York in order to appear and participate as counsel for Defendant STEPHEN WALSH in the above-captioned action.

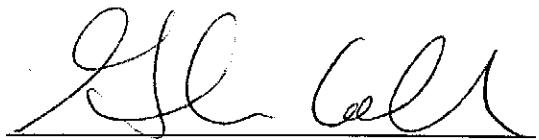
2. I am a member in good standing of the bar of this Court.

3. I have reviewed the Declaration of Mark A. Flessner in support of the motion for admission *pro hac vice* submitted herewith, and I believe that the Declaration is true and correct. Mark A. Flessner is fully familiar with the facts of this case.

4. Upon the foregoing facts, I respectfully request that the Court grant the motion for the admission *pro hac vice* of Mark A. Flessner to the bar of the United District Court for the Southern District of New York.

I declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct.

Dated: New York, New York
October 27, 2009



The image shows a handwritten signature in black ink. The signature consists of stylized initials "GC" followed by the surname "Colton". A horizontal line is drawn underneath the signature.

Glenn C. Colton

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This matter having been brought before the Court by motion to admit Mark A. Flessner *pro hac vice* to appear and participate as counsel for Defendant STEPHEN WALSH in the above-captioned matter, and the Declaration of such attorney having been submitted in support thereof, and it appearing that such attorney is a member in good standing of the Supreme Court of Illinois, and that there are no disciplinary proceedings against him as a member of the bar in any jurisdiction;

IT IS HEREBY ORDERED that, pursuant to Local Civil Rule 1.3(c) of this Court, Mark A. Flessner, is admitted to practice *pro hac vice* as counsel for Defendant STEPHEN WALSH in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately register for an ECF password.

Dated: October , 2009

United States District Judge

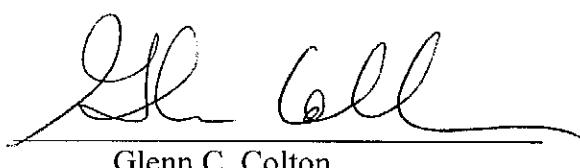
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I, Glenn C. Colton, hereby certify that on October 27, 2009, I caused true and correct copies of the NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE* and all supporting papers in the above-captioned proceeding, to be served in accordance with the Federal Rules of Civil Procedure, via prepaid first class mail, upon:

John Jay O'Donnell, Jr.
U.S. Attorney's Office, SDNY
One St. Andrew's Plaza
New York, NY 10007
Tel: (212) 637-2490
John.O'Donnell@usdoj.gov

Frederick Phillip Hafetz
Susan Rose Necheles
Tracy Ellen Sivitz
Hafetz & Necheles
500 Fifth Avenue, 29th floor
New York, NY 10110
Tel: (212) 997-7595
fph@hafetzlaw.com
srn@hafetzlaw.com
tes@hafetzlaw.com



The image shows a handwritten signature in black ink, appearing to read "Glenn C. Colton". It is written in a cursive style with a horizontal line underneath it.

Glenn C. Colton